

MEMO ENDORSED

Timothy W. Hoover
 Partner
 561 Franklin Street
 Buffalo, New York 14202
 Telephone: (716) 800-2604
 Facsimile: (716) 885-8569
 thoover@hooverdurland.com
 www.hooverdurland.com

**Hoover &
 Durland** LLP

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #:
 DATE FILED: 3/7/25

March 6, 2025

Via ECF

The Honorable Valerie E. Caproni
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: *United States v. Ciminelli*, No. 16-CR-776-VEC-6

Dear Judge Caproni:

I write on behalf of defendant Louis Ciminelli to request that the Court modify Mr. Ciminelli's release conditions (Dkt. 34) as follows:

- Eliminate Condition 7(d) (surrender any passport and no new applications); eliminate Condition 7(e) (not obtain a passport or other international travel document); and modify Condition 7(s) by eliminating "SURRENDER TRAVEL DOCUMENTS (& NO NEW APPLICATIONS) BY 10/5/16[.]" and replacing it with "Defendant may obtain new travel documents (including a passport and/or enhanced driver license)."

We make this request for two reasons. First, a REAL ID-compliant travel document (such as an enhanced driver license or passport), will be required for even domestic air travel within the United States beginning on May 7, 2025. (*See* <https://www.dhs.gov/real-id>.) Second, Mr. Ciminelli hopes to travel internationally in accord with his release conditions (which authorize other travel with the approval of his Probation Officer and consent of the A.U.S.A.), and would need a passport to do so, given that his prior passport was surrendered and is now expired. While he has no present international travel plans, he would like to visit a friend in Germany who is 92 years old. Mr. Ciminelli has been in compliance with his release conditions since the inception of this case, has made all required court appearances, and voluntarily surrendered for his now-vacated sentence. We conferred with the United States Probation Officer from the Western District of New York who supervises Mr. Ciminelli's release, and he indicated he had no objection to the above modifications. We informed the Government that we planned to make this request, and the Government takes no position on this request.

Thank you for the Court's consideration of this request.

Respectfully yours,

/s/Timothy W. Hoover

Timothy W. Hoover

TWH/
 cc: Counsel of record (via ECF)

Application GRANTED. Mr. Ciminelli's conditions of supervised release are modified to eliminate condition 7(d), (e), and (s). Mr. Ciminelli may obtain new travel documents (including a passport and/or enhanced driver license); however, any international travel must be authorized by Probation and consent of the U. S. Attorney's Office for the Southern District of New York.

SO ORDERED. 3/7/25

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE